



**POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT**

REGION	SITE NUMBER (to be assigned by HQ)
VI	TX-05436

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME THOMAS STEEL DRUMS		B. STREET (or other identifier) 2517 NE 35th	
C. CITY Fort Worth	D. STATE TX	E. ZIP CODE 76111	F. COUNTY NAME Tarrant
G. OWNER/OPERATOR (if known) 1. NAME Jim Boase - Plant Manager Curtis Thomas - Personal		2. TELEPHONE NUMBER (817)838-6891	
H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN			
I. SITE DESCRIPTION Firm reconditions old steel drums. Some residue in barrels is allegedly sent to an unidentified landfill; some is dumped on the ground (SEE PHOTO #2) ON SITE; REMAINDER of residue in drums is incinerated.			
J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Citizen's complaint - Ted & Fred Polser, Polser Marble Co., complaint made to Texas Air Control Board			K. DATE IDENTIFIED (mo., day, & yr.) 6/6/80
L. PRINCIPAL STATE CONTACT Jim Webb, Texas Air Poll. Control - Tarrant Co. 1. NAME Charles Gill, Supervisor Texas Dept. Water Resources			2. TELEPHONE NUMBER (817)870-7281 (214)298-6171

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input checked="" type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN		90068259
B. RECOMMENDATION <input type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: _____ b. WILL BE PERFORMED BY: _____ <input type="checkbox"/> 3. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: _____ b. WILL BE PERFORMED BY: _____ <input checked="" type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority) Recommend that sampling inspection be conducted to determine whether drum residues are migrating off-site.		

C. PREPARER INFORMATION		
1. NAME Barry Nash	2. TELEPHONE NUMBER (214)742-4521	3. DATE (mo., day, & yr.) 10/13/80

III. SITE INFORMATION

A. SITE STATUS <input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) <input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify): _____ (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)	
B. IS GENERATOR ON SITE? <input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): _____	
C. AREA OF SITE (in acres) 2-3 Acres	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg.-min.-sec.) 32° 48' 50" N 2. LONGITUDE (deg.-min.-sec.) 97° 18' 8" W
E. ARE THERE BUILDINGS ON THE SITE? <input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): Incinerators, paint shops	

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

<input checked="" type="checkbox"/> A. TRANSPORTER	<input checked="" type="checkbox"/> B. STORER	<input type="checkbox"/> C. TREATER	<input checked="" type="checkbox"/> D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	<input checked="" type="checkbox"/> 1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	<input type="checkbox"/> 2. LANDFARM
3. BARGE	3. DRUMS	3. VOLUME REDUCTION	<input checked="" type="checkbox"/> 3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	<input type="checkbox"/> 4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	<input type="checkbox"/> 5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	<input checked="" type="checkbox"/> 6. INCINERATION
		7. WASTE OIL REPROCESSING	<input type="checkbox"/> 7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	<input type="checkbox"/> 8. OTHER (specify):
		9. OTHER (specify):	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED TACB alleged that residue in drums is dumped into metal containers which are hauled to a landfill off-site. Drums are upended, and remaining residue is allowed to drain on the ground. Drums are then placed in ovens to incinerate remaining residue, sandblasted and repainted. Air quality problems arise during incineration and painting phases.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. UNKNOWN ☒ 2. LIQUID ☐ 3. SOLID ☒ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☒ 1. UNKNOWN ☐ 2. CORROSIVE ☒ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☒ 9. FLAMMABLE

Paints and solvents. TACB indicated that other chemicals may also be

☒ 10. OTHER (specify): present.

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below. TACB has list of suppliers of barrels and result of analyses of residue contained in some barrels. *Contact Jim Webb, TACB. (817) 870-7281.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT UNKNOWN	AMOUNT	AMOUNT UNKNOWN	AMOUNT UNKNOWN	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		<input checked="" type="checkbox"/> (3) OTHER (specify): Cleaning Solvents	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
<input checked="" type="checkbox"/> (5) OTHER (specify): Inks			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			<input checked="" type="checkbox"/> (11) OTHER (specify): UNKNOWN		

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

TACB Analysis: lead, titanium, barium, manganese, zinc, paint, solvents, unknown chemicals.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE. Barrels come from several sources. Most materials are paints, inks and solvents. Jim Webb, TACB, states that metal container has caught fire in the past, possibly due to incompatible wastes.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER	X			Potential for dumped residue to reach storm sewers during rainfall.
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR		X	Numerous Times	Texas Air Control Board has fined company several times.
12. NOTICEABLE ODORS		X	Numerous Times	Texas Air Control Board has received several citizen complaints.
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION		X	UNKNOWN	Container of wastes has caught fire more than once. (Jim Webb, TACB)
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			Residue is alleged to be dumped carelessly on to ground.
17. SEWER, STORM DRAIN PROBLEMS	X			Potential problem during rainfall.
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES	X			Fire may have been due to incompatible wastes.
21. MIDNIGHT DUMPING				
22. OTHER (specify):	X			Destination of collected barrel residue is unknown.

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE. Unpermitted

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

- ☐ 1. YES ☒ 2. NO ☐ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): No permit is held. Several complaints have been filed.

VIII. PAST REGULATORY ACTIONS

- ☐ A. NONE ☒ B. YES (summarize below) The Texas Air Control Board has had ongoing problems for several years. Enforcement cases were difficult to prosecute, and company generally chose to pay fines rather than appear in court.

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
SIP Inspection	2/4/76	EPA/TACB	Fugitive emissions seen as problem area at site.

X. REMEDIAL ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Enforcement Case	UNKNOWN	TACB	Fines paid by Thomas Steel Drum. Conditions remained unimproved.

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

Primary problem seems to be air pollution due to inadequate facilities to completely combust residue and insufficient draft to clear away emissions. A recon conducted by two members of the FIT team on October 2, 1980 indicated no current runoff problems. At the time of the visit, however, a potential problem was observed which may have been caused by previous runoffs from the site (See photo # 5).

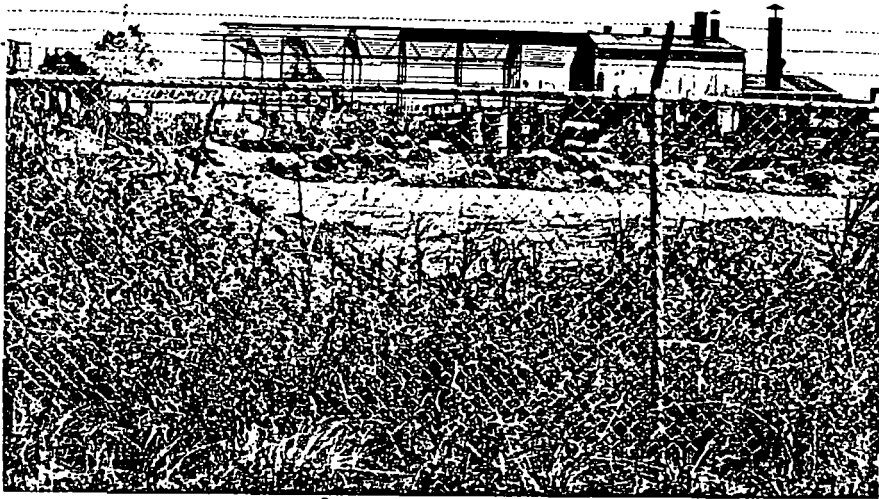


Photo 1

Photographer / Witness

Barry Nash / *Serge V. Saloff*

Date / Time / Direction

10/2/80 1430 East

Comments: Pit for unknown

purpose along west side of
property near Mapleleaf St.



Photo 2

Photographer / Witness

Barry Nash / *Serge V. Saloff*

Date / Time / Direction

10/2/80 1435 South

Comments: Unidentified waste
near incinerator.

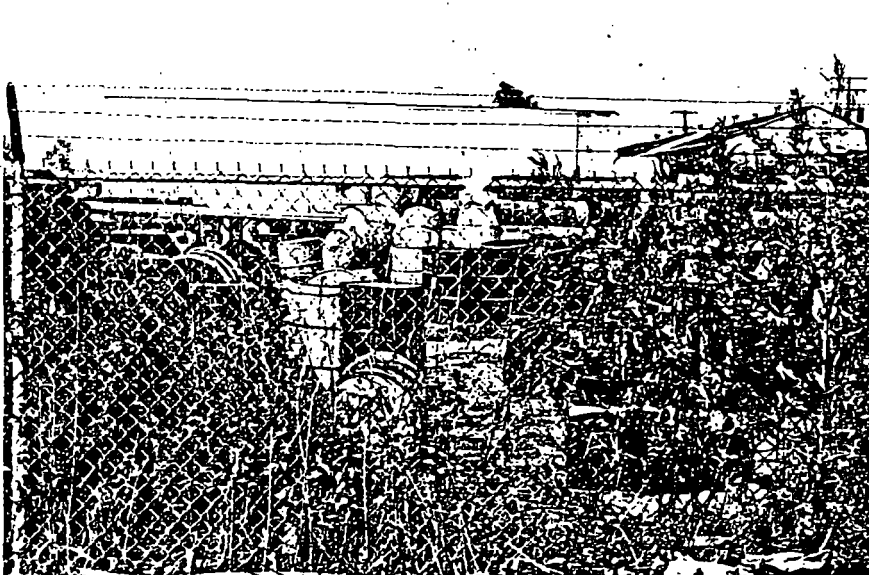


Photo 3

Photographer / Witness

Barry Nash / *Serge V. Saloff*

Date / Time / Direction

10/2/80 1440 North

Comments: Drums on site

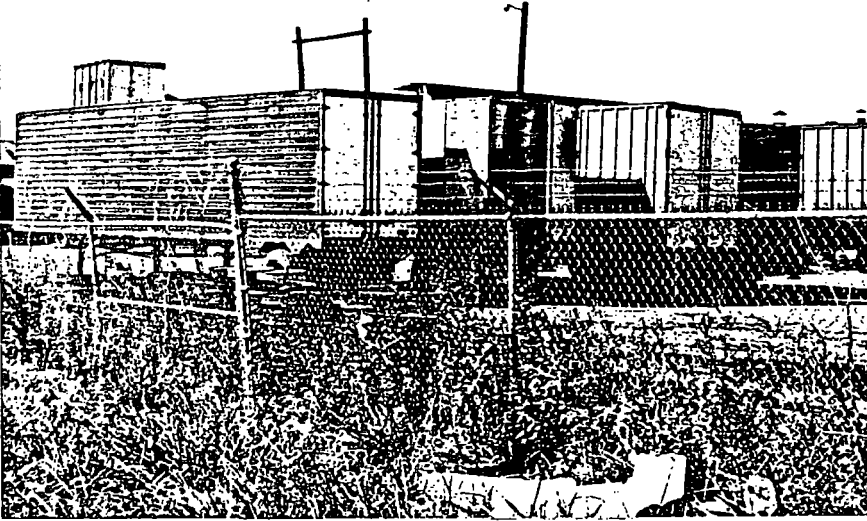


Photo 4

Photographer / Witness

Barry Nash / George V. Saff

Date / Time / Direction

10/2/80 1445 Northwest

Comments: Trucks loaded

with drums on site.



Photo 5

Photographer / Witness

Barry Nash / George V. Saff

Date / Time / Direction

10/2/80 1450 West

Comments: Green residue

along 35th Street, from

unknown origin. Appears

to originate on site. Residue

is about 15 feet from the
property line fence.

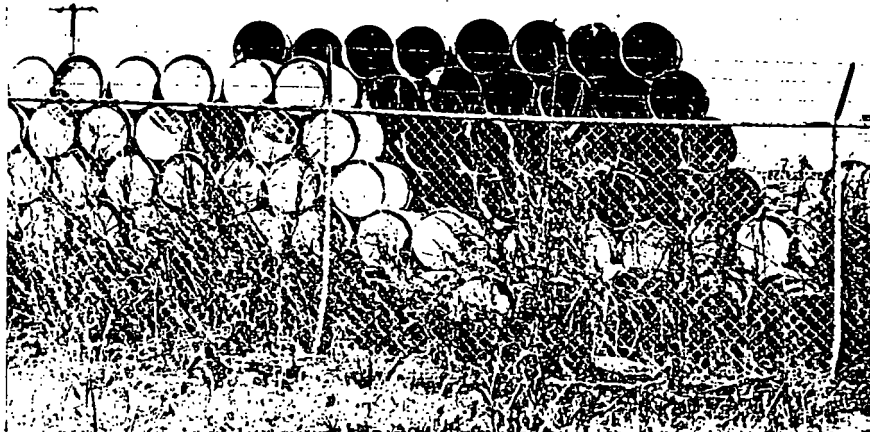


Photo 6

Photographer / Witness

Barry Nash / George V. Saff

Date / Time / Direction

10/2/80 1455 East

Comments: Drums on Northwest

corner of site, containing

dried paint.

TX 5436

EMERGENCY NUMBERS FOR FT WORTH (AREA CODE 817)

RE. THOMAS STEEL DRUMS

POISON CONTROL CENTER

336-6611

JOHN PETER SMITH HOSPITAL

921 - 3431

FIRE DEPARTMENT

332-2131

AMBULANCE

335-1213

POLICE

335 4222